

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF MIKE GLENN

DECLARATION OF MIKE GLENN

ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, Mike Glenn, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I am the Chief Executive of Jefferson Healthcare located in Port Townsend,  
5 Washington. In this role, I am honored to lead our caregivers and staff in ensuring the health  
6 care needs of all our community members are met in the most complete and compassionate ways  
7 possible.

8 3. Jefferson Healthcare is the primary healthcare provider for the more than 29,000  
9 residents of Eastern Jefferson County on the Olympic Peninsula in Washington State. Among  
10 other services, it operates a 25-bed critical access hospital, primary care clinics, and home health  
11 and hospice services.

12 4. I understand that the President of the United States has issued an Executive Order  
13 on January 28, 2025 titled, "Protecting Children from Chemical and Surgical Mutilation" and  
14 directing that hospitals, including ours must end gender affirming care for those under 19 years  
15 of age or face the threat of revocation of our compliance with the Medicare Conditions of  
16 Participation, which would end our ability to participate in Medicare and Medicaid programs  
17 which are a major source of funding.

18 5. The federal government's policy will have a variety of impacts on patients in our  
19 community leading to significant medical harm, including life threatening complications;  
20 concerns about physical impacts of children suddenly stopping hormones or puberty blockers;  
21 concerns about mental health effects of stopping this treatment; concerns about this potentially  
22 limiting our ability to provide these treatments for hormonal imbalance or children with early  
23 puberty who are not transgender but whose care could also be interrupted by the broad nature of  
24 the directive. We are also concerned about as yet unforeseeable consequences of this order that  
25 may harm patients.  
26

1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

3 DATED and SIGNED this 2nd day of February 2025 at Seattle, Washington.

4  
5   
6

7  
8 

---

Mike Glenn  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26